

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 11 Cr. 623 (JG)

- against -

AGRON HASBAJRAMI,

Defendant. :

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**NOTICE OF MOTION IN SUPPORT  
OF DEFENDANT AGRON  
HASBAJRAMI'S MOTION TO  
PRECLUDE EXPERT TESTIMONY**

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Joshua L. Dratel, Esq., and all prior papers and proceedings herein, the defendant, AGRON HASBAJRAMI, will move before the Honorable John Gleeson, United States District Judge for the Eastern District of New York, at the United States Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, to preclude or limit the proposed testimony of Evan Kohlmann, a proposed government expert, pursuant to the gate keeping requirements in *Daubert v. Merrell Dow Pharmaceuticals*, Rules 702, 703, 401, 402, and 403, of the Federal Rules of Evidence; and the Sixth Amendment's Confrontation Clause; and, for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York  
23 June 2015

/S/ Joshua L. Dratel  
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To: THE HON. JOHN GLEESON

UNITED STATES ATTORNEY  
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